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8 *Attorneys for Defendant*
9 *Wal-Mart Stores, Inc.*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 IVAN MORA-ESPINOSA, an Individual;

13 Plaintiff,

14 v.

15 WAL-MART STORES INC., a Delaware
16 Corporation doing business as WAL-MART;
DOES I-X, unknown persons; and ROE
Corporations I-X;

17 Defendants.

Case No.: 2:17-cv-02955-MMD-GWF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
MOTION PRACTICE REGARDING
MOTION TO REMAND CASE TO
NEVADA DISTRICT COURT – FIRST
REQUEST

19 Plaintiff IVAN MORA-ESPINOSA (hereinafter “Plaintiff”) and Defendant WAL-MART
20 STORES, INC. (hereinafter “Walmart”) (collectively, the “Parties”), by and through their respective
21 counsel of record, do hereby stipulate to extend time to file responding motions pertaining to
22 Plaintiff’s Motion to Remand Case to Nevada District Court, originally filed on December 5, 2017.
23 ECF No. 5 (D. Nev. Dec. 5, 2017).

24 Specifically, the Parties stipulate that Walmart’s Opposition to Plaintiff’s Motion to Remand
25 Case to Nevada District Court shall be due *no later than* Tuesday, January 9, 2018, and Plaintiff’s
26 Reply in support of his Motion to Remand Case to Nevada District Court shall be due *no later than*
27 Tuesday, January 16, 2018. The Parties request this additional time so that they may attempt to
28 resolve this matter without having to incurring additional costs associated with motion practice.

1 The Parties aver that good cause exists for this request pursuant to Local Rule IA 6-1, and this
2 is the first such stipulation for extension of time to stay motion practice regarding this matter.

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4 DATED this 19th day of December, 2017.

5 **RYAN ALEXANDER, CHTD.**

6 /s/ *Ryan Alexander*

7 RYAN ALEXANDER, ESQ.
8 Nevada Bar No. 10845
9 3017 West Charleston Boulevard, Suite 58
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(702) 868-3311
10 Attorneys for Plaintiff
Ivan Mora-Espinosa

DATED this 19th day of December, 2017.

PHILLIPS, SPALLAS & ANGSTADT, LLC

/s/ *Pooja Kumar*

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504 South Ninth Street
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Attorneys for Defendant
Wal-Mart Stores, Inc.

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14 **IT IS SO ORDERED.**



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17 **UNITED STATES DISTRICT COURT JUDGE**

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19 DATED: December 20, 2017

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